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Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA, SANTA ANA DIVISION

In re
KRISTINA LYNN SMITH

Debtor.

Case No. 8:24-bk-12527-SC

Chapter 7

NOTICE OF APPLICATION BY CHAPTER 7
TRUSTEE TO EMPLOY HAHN FIFE &
COMPANY LLP AS ACCOUNTANTS

[NO HEARING REQUIRED]

TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY
JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL OTHER
INTERESTED PARTIES:

PLEASE TAKE NOTICE that Richard A. Marshack, the Chapter 7 Trustee (“Trustee” or
“Applicant”) of the Bankruptcy Estate of KRISTINA LYNN SMITH, (the “Debtor”), has filed
an Application for entry of a Court Order authorizing the employment of Hahn Fife & Company
LLP as the Trustee’s accountant in this case pursuant to 11 U.S.C. § 327(a) (the “Application”)
effective October 30, 2025.

On October 3, 2024, Debtor filed a petition for bankruptcy under Chapter 7 of Title 11
(the “Petition Date”).

1 Applicant proposes to employ Hahn Fife & Company, LLP (“Hahn Fife” or the “Firm”)
2 to provide accounting services to the bankruptcy estate that include preparing and filing
3 necessary state and federal estate tax returns, review of financial documents and any other
4 reasonable duties assigned by the Trustee.

5 Applicant proposes to retain Hahn Fife upon the following basis: Except as the Court
6 may otherwise determine, after due notice, Hahn Fife will petition the Court under 11 U.S.C.
7 Sections 330 for an allowance of fees and reimbursable costs not more often than every 120
8 days. The petition will be heard upon notice to necessary parties. Hahn Fife will accept
9 compensation and reimbursements of expenses in such amounts that the Court may award.
10 There will be no written employment agreement apart from this Application. The only source of
11 payment or compensation will be the estate. No retainer has been paid or is being proposed to
12 Hahn Fife.

13 The Firm has advised the Trustee that the Firm has not shared or agreed to share any
14 compensation to be received by it in this case with any other person, except as among partners of
15 the Firm.

16 The Firm’s current hourly billing rates are as follows:

Timekeeper	Rate
Donald T. Fife	\$530.00

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19 The complete scope and terms of the employment are detailed in the Application a copy
20 of which can be obtained by contacting Donald T. Fife at 790 E. Colorado Blvd., 9th Floor,
21 Pasadena, CA 91101. The Application is based on 11 U.S.C. Section 327 and the Firm intends
22 to seek compensation pursuant to 11 U.S.C. Sections 330 and 331.

23 **PLEASE TAKE FURTHER NOTICE** that any response and request for hearing as to
24 the proposed employment must be in the form as required by Local Bankruptcy Rules 2014-1(b),
25 9013-1(f) and (o) and filed with the Clerk of the above-entitled Court. The deadline for any
26 response and request for hearing is 14 days after the date of service of this Notice, plus an
27 additional 3 days unless this Notice was served by personal delivery or posting as described in
28 F.R.Civ.P. 5(b)(2)(A)-(B). A copy of any response or request for hearing must be served on

1 Richard A. Marshack at the address indicated above and Donald T. Fife at 790 E. Colorado
2 Blvd., 9th Floor, Pasadena, CA 91101. A copy must also be served on the Office of the United
3 States Trustee, 411 W. Fourth Street, Suite 7160, Santa Ana, California 92701. Failure to timely
4 respond may be deemed as acceptance of the proposed employment. See Local Bankruptcy
5 Rules 9013-1(h).

6
7 Dated: November 2, 2025

Respectfully submitted,

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9 By: /s/ Richard A. Marshack
10 RICHARD A. MARSHACK
11 Chapter 7 Trustee for the Bankruptcy Estate of
12 Kristina Lynn Smith
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
870 Roosevelt Avenue, Irvine, CA 92620

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF APPLICATION BY CHAPTER 7 TRUSTEE TO EMPLOY HAHN FIFE & COMPANY LLP AS ACCOUNTANT** will be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **November 2, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **David Coats** dacoats@raslg.com
- **Benjamin Heston** bhestonecf@gmail.com, benheston@recap.email, NexusBankruptcy@jubileebk.net
- **Richard G. Heston** rheston@hestonlaw.com, yflores@hestonlaw.com, docs@hestonlaw.com, HestonRR41032@notify.bestcase.com, hestonlaw@recap.email
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- **Richard A Marshack (TR)** pkraus@marshackhays.com, ecf.alert+Marshack@titlexi.com
- **Jacob Newsum-Bothamley** jacob.bothamley@dinsmore.com, bonnie.connolly@dinsmore.com
- **Matthew J Stockl** mstockl@otterbourg.com, katrice.ortiz@dinsmore.com
- **United States Trustee (SA)** ustpreion16.sa.ecf@usdoj.gov
- **Julie J Villalobos** julie@oaktreelaw.com, oakecfmail@gmail.com; villalobosjr51108@notify.bestcase.com; gus@oaktreelaw.com
- **Jennifer C Wong** bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On **November 3, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

November 3, 2025 Pamela Kraus
Date Printed Name

/s/ Pamela Kraus
Signature

2. SERVED BY UNITED STATES MAIL: continued

DEBTOR

KRISTINA LYNN SMITH
27591 KATHY CT
LAGUNA NIGUEL, CA 92677-6025

SECURED CREDITOR / POC ADDRESS

THE NESHANIAN LAW FIRM
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20 LARGEST CREDITOR

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20 LARGEST CREDITOR

KOHL'S
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20 LARGEST CREDITOR

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20 LARGEST CREDITOR

MISSION PROVIDENCE HOSPITAL
27799 MEDICAL CENTER RD
MISSION VIEJO, CA 92691-6400

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CANTON, OH 44718